

1 Robert A. Julian (SBN 88469)
2 Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
3 San Francisco, CA 94111
Telephone: 628.208.6434
4 Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
5 Email: cdumas@bakerlaw.com

6 Eric E. Sagerman (SBN 155496)
7 David J. Richardson (SBN 168592)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
8 11601 Wilshire Blvd., Suite 1400
Los Angeles, CA 90025-0509
9 Telephone: 310.820.8800
Facsimile: 310.820.8859
10 Email: esagerman@bakerlaw.com
Email: drichardson@bakerlaw.com
11 Email: lattard@bakerlaw.com

12 *Counsel for Official Committee of Tort Claimants*

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors**

21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24
25 *All papers shall be filed in the Lead Case,
26 No. 19-30088 (DM)

27 Case No. 19-30088 (DM)

28 Chapter 11

(Lead Case)

(Jointly Administered)

29
30 **DECLARATION OF DAVID J.
RICHARDSON IN SUPPORT OF
MOTION TO FILE REDACTED
DECLARATION OF JAMES
DRINKHALL IN SUPPORT OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' MOTION PURSUANT TO
11 U.S.C. §§ 105(a) AND 501 AND FED.
R. BANKR. P. 3003(c) FOR ENTRY OF
AN ORDER EXTENDING THE BAR
DATE**

1 DAVID J. RICHARDSON, under penalty of perjury, declares:

2 1. I am Counsel at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants (the “**TCC**”) of PG&E Corporation and Pacific Gas and Electric Company (the
4 “**Debtors**”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the TCC’s motion (“**Redaction Motion**”) for
6 entry of an order authorizing the filing of the redacted declaration of James Drinkhall (“**Drinkhall**
7 **Declaration**”) in support of the TCC’s Motion Pursuant to 11 U.S.C. §§ 105(A) and 501 and Fed.
8 R. Bankr. P. 3003(C) for Entry of an Order Extending the Bar Date (“**Bar Date Motion**”).

9 3. After individuals’ attorneys brought facts and declarations to the TCC this month
10 concerning various impairments and circumstances that have prevented individual claimants from
11 filing claims prior to the claims bar date, lead trial counsel for the TCC conducted his own
12 investigation by traveling this past weekend to the FEMA emergency housing site for Camp Fire
13 survivors, together with investigator James Drinkhall (“**Drinkhall**”), where they interviewed
14 survivors and corroborated the facts described in the victims’ Declarations.

15 4. The Drinkhall Declaration contains the names and stories of these individual fire
16 victims that Drinkhall interviewed, but also includes certain personal information that is relevant
17 to the nature of the impairments discussed in the Bar Date Motion, but should be protected from
18 disclosure with connection to their identities. These individuals’ names and identities are
19 unnecessary for the general public to understand the scope of the problem identified in the Bar Date
20 Motion.

21 5. Contemporaneously herewith, the TCC is transmitting and unredacted copy of the
22 Drinkhall Declaration to the Debtors.

23 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States
24 of America that the foregoing is true and correct to the best of my knowledge and belief.*

25 Dated: Los Angeles
26 October 16, 2019

/s/ David J. Richardson
27 David J. Richardson